



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

stockholder from the corporation itself clearly governs the principal case. See *COOK, CORPORATIONS*, Vol. 1, § 11; *Humphreys v. McKissock*, 140 U. S. 304.

FOREIGN LAW—JUDICIAL NOTICE OF LAW OF ANOTHER STATE.—Plaintiff set out in his pleadings the law of another state, but failed to prove it. *Held*, the court may proceed on their knowledge of the laws of another state, and it is not necessary in that case to prove them. *Missouri State Life Ins. Co. v. Lovelace* (1907), — Ct. App. Ga. —, 58 S. E. Rep. 93.

This decision rests on the Georgia Civil Code (1895), § 5231, which provides: "The public laws of the United States and of the several states thereof, as published by authority, shall be judicially recognized without proof." This is the first direct decision on this section of the code, but a like interpretation was hinted at in *Seaboard Air Line Ry. Co. v. Phillips*, 117 Ga. 98, though the same was unnecessary for the decision in that case. The court in the principal case cites *Herschfeld v. Dixel*, 12 Ga. 582,—a case decided long before Georgia had a code,—but all that was said there in regard to this point was dictum. *Barranger v. Baum*, 103 Ga. 465, was also noticed in the principal case, but the decision in that case rests on *Herschfeld v. Dixel*. But it would seem that *Barranger v. Baum*, which was decided since the code went into effect in Georgia, is authority against the holding in the principal case, as the court there said: "It is true ordinarily that whenever it becomes necessary for a court of one state, in order to give effect to a public act of another, to ascertain what effect it has in that state, the law in that state must be proved as a fact." So it can be said the decision in the principal case must rest on the above section of the code. It now becomes necessary to know what are public laws as "published by authority." It has been held that it is published by authority if it purports to have been printed by authority of the Governor. *Wilt v. Cutter*, 38 Mich. 189, or by authority of the General Assembly, *Vaughn v. Griffith*, 16 Ind. 353; or when it purports to have been printed by the state, *Paine v. Lake Erie Ry. Co.*, 31 Ind. 283; or when it purports to have been published by authority of a certain statute which is fully set out, *Falls v. U. S. Savings Co.*, 97 Ala. 417. It is not enough, that the statute purports to be printed by authority, but does not say what authority. *Merrifield v. Robbins*, 8 Gray (Mass.) 150; contra, *Edmonds v. State*, 79 Ala. 48.

INNKEEPERS—PROPERTY SUBJECT TO LIEN.—A guest at an inn placed in her rooms a piano, purchased under a contract of sale, reserving the title in the vendor until the price had been paid. *Held*, the inn-keeper was entitled to hold the piano as against the owner, to satisfy unpaid charges for entertainment. *Horace Waters & Co. v. Gerard* (1907), 189 N. Y. 302, 82 N. E. Rep. 143.

A state statute giving the inn-keeper a lien upon the property of third persons rightfully in the possession of the guest, is held to be merely declaratory of the common law and not to extend the inn-keeper's lien. The constitution of New York, adopted in 1777, ordains that the common law